

# **EXHIBIT A**

**Derek C. Chen**

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**From:** Derek C. Chen  
**Sent:** Friday, May 31, 2019 1:48 PM  
**To:** Joseph Thomas; Jayne L. Freeman  
**Cc:** LaHoma Walker  
**Subject:** RE: 2:17-cv-00642-MJP Dalessio v. University of Washington

Joe,

We do not stipulate to sealing PRR 19-00035. By your own admission, you have only skimmed the documents so it is unclear how you can argue the entire production merits sealing.

We also do not agree that PRR 19-00035 is relevant to the four questions the Court limited the parties to (Dkt. 160) and is further irrelevant as it was a request made after the time period at issue in this lawsuit. There is no basis for its late supplementation to the Court records which will assuredly push out the hearing date. Plaintiff has not produced any sworn testimony detailing why these documents could not have been included in her response papers at the end of April. We will object to this untimely disclosure.

Sincerely,

Derek Chen

*Derek C. Chen*  
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**From:** Joseph Thomas <[joe@joethomas.org](mailto:joe@joethomas.org)>  
**Sent:** Friday, May 31, 2019 9:59 AM  
**To:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>

**Cc:** LaHoma Walker <LWalker@kbmlawyers.com>; 'JULIE' <juliedalessio@msn.com>

**Subject:** RE: 2:17-cv-00642-MJP Dalessio v. University of Washington

Jayne and Derek,

Please respond to my email from yesterday asking if you will agree to a stipulated motion to file the documents under seal. This is a time sensitive matter, and Jayne has already responded to the Court's email this morning, even though it was sent more than more than 14 hours after mine.

Very truly yours,

Joe

Cc: Julie Dalessio

Joseph Thomas  
Law Office of Joseph Thomas PLLC  
5991 Rainier Ave. South, # B  
Seattle, Washington 98118  
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Website: <http://JoeThomas.org>

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**From:** Joseph Thomas <[joe@joethomas.org](mailto:joe@joethomas.org)>

**Sent:** Thursday, May 30, 2019 5:03 PM

**To:** 'Jayne L. Freeman' <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; 'Derek C. Chen' <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>

**Cc:** 'LaHoma Walker' <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>; 'JULIE' <[juliedalessio@msn.com](mailto:juliedalessio@msn.com)>

**Subject:** RE: 2:17-cv-00642-MJP Dalessio v. University of Washington

Jayne and Derek,

These document are evidence the UW is continuing to produce confidential medical information about Ms. Dalessio. Specifically, in PR 2019-00035 Perry Tapper, who is a named Defendant in this lawsuit, is the person who produced the confidential medical information about Ms. Dalessio to Public Records News Media. There were many documents produced, but for expediency I have selected 20 of the documents that contain similar medical information about Ms. Dalessio that is currently being argued.

Attached to this document are:

- Release Letter – addressed to Public Records News Media and signed by Perry Tapper
- Release - 20 of the selected documents produced

Please treat these documents as confidential.

Do you agree to a stipulated motion, so that I can I file these documents under seal?

Very truly yours,

Joe

Cc: Julie Dalessio

Joseph Thomas  
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**From:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>  
**Sent:** Thursday, May 30, 2019 1:21 PM  
**To:** Joseph Thomas <[joe@joethomas.org](mailto:joe@joethomas.org)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>  
**Cc:** LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>  
**Subject:** RE: 2:17-cv-00642-MJP Dalessio v. University of Washington

Joe: we have no way of knowing what information you are talking about unless you send us the documents you are referring to and to whom they were allegedly disclosed. The attachment you sent was only a copy of a letter listing exemptions, presumably related to information that was withheld or redacted.

The circumstances and context of what you are referring to is also unclear, as well as how any information purportedly obtained in 2019 would be relevant or material to the four questions the court posed to the parties to answer in a hearing next week. I will be out of the office Friday and Monday, so not sure what exactly you are proposing, but we certainly don't have enough information to even figure something out.

*Jayne L. Freeman*  
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**(Please note our new address)**

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**From:** Joseph Thomas <[joe@joethomas.org](mailto:joe@joethomas.org)>  
**Sent:** Thursday, May 30, 2019 12:42 PM  
**To:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>  
**Cc:** 'JULIE' <[juliedalessio@msn.com](mailto:juliedalessio@msn.com)>; LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>  
**Subject:** 2:17-cv-00642-MJP Dalessio v. University of Washington

Dear Jayne and Derek:

I am writing to you with an urgent matter in the *Dalessio v. UW* case. My client, Ms. Dalessio, just contacted me today and told me that she new evidence that is pertinent to the second motion for summary judgment. Ms. Dalessio has evidence that UW is continuing to produce Ms. Dalessio's private medical information under the Public Records Act to third parties, as is being argued right now in the second motion for summary judgment. I have skimmed through the documents and there are many pages, a conservative estimate is at least 20 pages, of her private medical information being produced to third parties. These documents have doctor's names, signatures, patient number, medical progress reports, requests for disability accommodations, mental health information, etc. Because of Ms. Dalessio's poor health, she did not look at this information until after Plaintiff's response to second summary judgment was filed.

Attached to this email is UW's letter of partial release. The Public Records Act tracking number is PR 2019-0035.

Please review these documents at your earliest convenience, so we can talk about how to introduce these documents as newly discovered evidence. My hope is that we can agree on how to submit these documents under seal before the oral argument next week. Since time is of the essence, I hope we can work this out as soon as possible.

Very truly yours,

Joe

Cc: Julie Dalessio

Joseph Thomas  
Law Office of Joseph Thomas PLLC  
5991 Rainier Ave. South, # B  
Seattle, Washington 98118  
Phone: (206) 390-8848  
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